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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

BRIGID POLING, individually and on
behalf of all others similarly situated and on
behalf of the general public,

Plaintiff,

vs.

ARTECH L.L.C.,

Defendants.

Case No.: 3:20-cv-07630-LB

**NOTICE OF CONDITIONAL
SETTLEMENT AND STIPULATED
MOTION TO STAY ALL
DEADLINES PENDING
DETERMINATION OF MOTIONS
TO APPROVE SETTLEMENT**

NOTICE OF CONDITIONAL SETTLEMENT

Plaintiff Brigid Poling, individually and on behalf of all others similarly situated (“Plaintiff”) and Artech, L.L.C. (“Defendant”) (collectively the “Parties”) respectfully give the Court notice that they have reached a settlement in principle in the above-captioned matter conditioned on approval of the settlement by the Court.

STIPULATED MOTION TO STAY DEADLINES

The Parties hereby move for an order staying all deadlines in the above-captioned matter pending determination of their planned motions for preliminary and final approval of a

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1 contemplated class-wide settlement (“Instant Motion”). Good cause exists to grant the Instant
2 Motion as follows:

3 1. The Parties attended mediation with the Honorable Edward A. Infante (Ret.) on
4 June 28, 2021 and reached agreement on terms of a proposed class-wide settlement potentially
5 encompassing more than 30,000 current and former employees of Defendant whose personally
6 identifiable information may have been accessible to unauthorized third-parties due to a
7 ransomware attack on Defendant’s servers between and including January 5 and January 8, 2020.

8 2. The terms of the proposed settlement were the result of good-faith, arms-length
9 negotiations.

10 3. The proposed nationwide class-action settlement agreement is contingent upon
11 final approval by the Court, and the Parties have reserved all claims, rights, defenses, and
12 arguments should the agreement not receive final approval.

13 4. The Parties expect to be able to execute a final settlement agreement and file a
14 Joint Motion for Preliminary Approval of that agreement by July 28, 2021, with a Joint Motion
15 for Final Approval to be filed thereafter as applicable, appropriate and reasonable.

16 5. Maintaining existing deadlines in the above-captioned matter while the settlement
17 approval process is ongoing would result in an unnecessary expenditure of time and funds by the
18 Parties and the Court, and be contrary to the policies of encouraging settlement and conserving
19 judicial resources.

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For the reasons outlined above, the Parties respectfully request that the Court order all pending deadlines in the above-captioned action, aside from those established by the Court in ruling on this motion, be stayed pending the Court's determination of the Parties' planned motions for preliminary and/or final approval of the proposed class-action settlement agreement.

Respectfully submitted,

DATED: July 8, 2021

ERICKSEN ARBUTHNOT

By: /s/ Jesse A. Boyd
Jesse A. Boyd
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By: /s/ Andrew J. Chan
Andrew J. Chan
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*Attorneys Specially-appearing for Defendant
Artech L.L.C.*

DATED: July 8, 2021

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1 DATED: July 8, 2021

ABINGTON COLE + ELLERY

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4 Cornelius P. Dukelow*

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10 DATED: July 8, 2021

FEDERMAN & SHERWOOD

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18 Counsel for Plaintiff and the Proposed Class
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